

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

In re:
CHARLES L. HATCH
THERESA A. HATCH

Case No. 05-70650-SCS
Chapter 13

Debtor(s) .

LONG BEACH MORTGAGE,
c/o WASHINGTON MUTUAL BANK, FA
9601 McCallister Freeway, Suite 110
San Antonio, TX 78216
Plaintiff,

v.

CMN

CHARLES E. HATCH
THERESA A. HATCH,
GEORGE W. NEAL, Trustee,

Defendant(s) .

A N S W E R

COME NOW the debtors by counsel, and for their answer to the Motion For Relief from Stay filed herein, represents that they have no objection to the entry of the order.

1. The allegations contained in paragraphs 1, 2, 3, 4, and 5 are hereby admitted.

2. The allegations contained in paragraphs 6, 7, 8, 9, 10 11, 12, 13, 14, 15, and 17 are neither admitted nor denied and strict proof thereof is demanded.

James L. Pedigo, Jr., Esquire (VSB #30796)
Counsel for Debtors
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WHEREFORE, the debtors pray that the motion for relief be dismissed; that the relief requested be denied; and for such other and further relief as in the premises may seem meet.

CHARLES E. HATCH
THERESA A. HATCH

By /s/ James L. Pedigo, Jr.
Of Counsel

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing Answer was mailed/or electronically forward this 29th day of June, 2005 to Howard N. Bierman, Esquire, Counsel for Long Beach Mortgage c/o Washington Mutual Bank, FA, Bierman, Geesing & Ward, L.L.C.; George W. Neal, Trustee, 870 Greenbrier Circle, Suite 402, Chesapeake, VA 23320, the debtors 301 Morton Street, Franklin, VA 23851.

/s/ James L. Pedigo, Jr.
James L. Pedigo, Jr., Esquire

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